



KLINGELNBERG AG

POLICY STATEMENT ON RESPECT FOR HUMAN RIGHTS AND ENVIRONMENTAL PROTECTION IN ACCORDANCE WITH THE GERMAN SUPPLY CHAIN ACT

AS OF 1 DECEMBER 2023

KLINGELNBERG AG

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Policy Statement on Respect for Human Rights and Environmental Protection in accordance with the German Supply Chain Act

As a globally operating group of companies with far-reaching international ties, KLINGELNBERG AG and all its affiliated companies believe to have a special responsibility to work towards improving the human rights situation and the protection of the environment worldwide and are therefore committed to ecologically and socially responsible corporate governance. This policy statement in accordance with the Act on Corporate Due Diligence Obligations in Supply Chains [DE: Lieferkettensorgfaltspflichtengesetz, LkSG / EN, hereinafter; the Supply Chain Act] reaffirms the will of management and employees to identify risks related to human rights and the environment and to minimize or eliminate these risks. We are committed to ensuring that these rules of conduct are integrated into our corporate culture and actively practiced.

In addition, we not only consider ourselves, but also our suppliers and service providers in our supply chains. We expect our suppliers and service providers to observe the principles of good ecological, social and ethical conduct.

Our understanding of acting responsibly also includes the effects that arise indirectly from our actions or that could be influenced by our actions. We conduct our business activities in accordance with internationally applicable standards and guidelines, such as the United Nations Universal Declaration of Human Rights (UDHR) and the conventions and recommendations of the International Labor Organization on labor and social standards. These include, in particular, the prevention of discrimination, occupational health and safety, observance of freedom of association, fair pay, observance of working time regulations, and the prevention of child labor and forced labor.

In terms of structured and qualitative further development, we strive to constantly improve our business activities and our services in accordance with the principles of sustainability. In line with the requirements of a holistic approach, we require our suppliers and service providers to take measures that are equivalent in terms of quality and quantity.

To this end, we have set up a risk management system to enable us to identify and analyze risks relating to human rights and environmental legislation within our supply chain at an early stage. Every internal process, external supplier or service provider is subjected to a structured risk analysis and assessed according to the identified risk potential. On this basis, measures can then be taken to ensure compliance with human rights and environmental protection requirements within the supply chain. The result of the risk analysis is communicated annually to the executive management and the supervisory bodies.



We evaluate our established measures with regard to their effectiveness in order to continuously improve this process. We also regularly review this Policy Statement and our internal and external communications, adapting them as necessary to changing circumstances with the aim of becoming even more transparent.

Despite all due diligence with regard to compliance with these commitments, we are aware that violations may occur in our supply chains. That is why we have established a whistleblower system that gives everyone associated with us – whether employees, business partners, suppliers or customers – the opportunity to report violations of requirements and laws within our supply chains. Such a report can be made at any time and also anonymously. We undertake to maintain confidentiality about the identity of the whistleblower. Any reports received will be processed and documented by our Human Rights Officer.

Implementation of and compliance with this Policy Statement is the responsibility of the executive management of KLINGELNBERG AG. The establishment, coordination and review of all necessary measures is integrated into our Compliance Management System (CMS). Our Compliance and Human Rights Officer monitors the relevant legal and corporate requirements and due diligence obligations, working closely with the Purchasing department.

Contact:

Human Rights Officer according to the German Supply Chain Act:

Robert Stiefelhagen, Head of Legal and Compliance Officer

Options to file concerns/complaints according to the German Supply Chain Act:

Our whistleblower system implemented group-wide also offers third parties and suppliers the opportunity to report violations in the supply chain, even anonymously. The whistleblower system can be accessed on our website using the following link:

<https://klingelberg.integrityline.io/>

All concerns and complaints will be treated confidentially and in compliance with national and international laws and standards.



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